

Federal Court
Eastern District
of Pennsylvania

United States of America

v.

5:19-cr-00581-JFL

Angelo M. Pennesi Jr

Supplemental Certification in
Support of Compassionate Release
Motion - Currently Pending

1. I am the Defendant in the above captioned matter and the movant in the pending motion for compassionate release, ~~pending~~.
2. Approximately, two weeks ago I received the results of a biopsy that was taken from my tongue. The biopsy confirmed the doctors' ~~opinion~~ beliefs that I have a malignant tumor on my tongue.
3. Over the last week's time, I have met with a surgeon, anesthesiologist, and plastic surgeon and have learned about the seriousness of my medical condition.
4. I am currently scheduled for surgery but due to security purposes I do not know when (other than it will be within the next week).
5. The surgery will take 12 hours and will

include the removal of one half of my tongue, minimally. Pathology reports will be generated in real time during the surgery and may result in the entire tongue being removed.

6. Also, all lymph nodes on my left upper torso will be removed.

7. A plastic surgeon will attempt to reconstruct my tongue using ~~my~~ tissue, veins and arteries from my right thigh.

8. After surgery I will remain in the hospital for weeks with a tracheostomy and feeding tube. However, it is the long term challenges I will face that lend themselves to a modification of my sentence to allow for home confinement.

9. I will have to learn how to swallow as the muscle in my tongue that controls swallowing will be partially removed. I will need considerable additional time to eat anything, however, my diet will be severely limited to soft foods and liquids,..... forever/ for as long as I live.

10. I will also need speech therapy as I will have to relearn how to speak with half of my tongue removed. The reconstruction of the tongue allows for extremely limited movement of the reconstructed area due to a lack in medial advancement to allow ^{reconstructed} tongues to move in more than one direction.

11. I will also undergo eight weeks of radiation therapy five times per week.

The side effects of the radiation including painful sores throughout the mouth and exhaustion will be better served through home confinement than in a 15' x 9' cell with five cell mates and one plastic chair. I have an upper bunk that I have been unsuccessful in trading for a lower bunk.

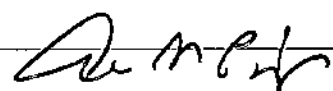
12. Presently, I am in my tenth month of captivity; I will be due 162 days of good time (5 months and 10 days); I will qualify for one year of home confinement (I am being submitted for that in October 2021); and I have worked and programmed on every possible occasion resulting in three months of earned time credits under the Readiness Reduction Act. When calculated I will only be gaining 5½ months of home confinement time versus time spent in prison.* I have attached confirmation of some of the courses/apprenticeships I have taken part in. I am currently in a 40 hour drug program and a six month physical trainer certification program^(90% completed) while I await a final exam in a "Safe Serv" program I completed.^(6 hrs credit) If the additional credits are counted, home confinement^{now} will reduce my jail time by less than 90 days. 90 days I can spend in therapy.

* 5½ months gives me no credit for any additional time earned between now and December. During that time I can/will earn an additional 2 months of time credits.

13. If allowed home confinement I will receive radiation through the Lehigh Valley Health Network; I have insurance for the care; and I have family support and income to aid in my recovery.

14. When considering the amount of time I have spent in solitary confinement; the loss of vision due to stroke and now the malignant cancer that have contributed to my continuing deteriorating physical condition; and the short time I have left to serve, under the totality of all of the circumstances within which I find myself, I request the Court to order immediate home confinement, post surgery, to allow me to ~~test~~ attend physical therapy, swallowing therapy, speech therapy, and radiation therapy from my home where family support, love, and caring will aid in my recovery.

I certify that the Certification above is true. I know that if anything stated in the Certification is willfully false, I am subject to punishment.



Angel M Peralta Sr

Edward Hahn Federal Building

8/19/21

504 W. Hamilton St.

Allentown, Pa 18101

Re: 5:19-cr-00581-JFL

Dear Clerk:

Please accept this additional certification to the pending "Motion for Compassionate Release" that is before Judge Leeson. New information, vital to the motion, has been discovered. I would like said new information considered by the Court,
Thank you.

Yours very truly,

Amf

Angelo M. Perruci Sr.

Angelo Jucca

77469-066

Federal Correctional Institution

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Cresson, Pa 16630

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